

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ALBERT KNIGHT, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

CHOICEPOINT, INC., *et al.*,

Defendants.

Civil Action No. 08-04676-NLH-AMD

**CONSENT MOTION
TO EXTEND THE TIME
FOR DEFENDANTS TO ANSWER,
MOVE OR OTHERWISE
RESPOND TO THE COMPLAINT**

Pursuant to Rule 6.1 of the Local Rules, Defendants Choicepoint, Inc., Choicepoint Services, Inc., National Data Retrieval, Inc. and Superior Information Services, Inc. move for an order granting Defendants a brief extension, to Monday, February 2, 2009, of the time to answer, move or otherwise to respond to the Complaint. Plaintiff has consented to Defendants' request for an extension and does not oppose this Motion.

In support of this Motion, Defendants aver as follows:

1. Presently, Defendants must answer, move or otherwise respond to the Complaint on or before January 15, 2009.

2. Defendants recently retained new counsel, Sharon F. McKee of Hangley Aronchick Segal & Pudlin, as well as the law firms of Morrison & Foerster LLP and Faruki Ireland & Cox P.L.L. (which intend to seek admission to the Court *pro hac vice*), to represent them in this action. While counsel have been working diligently to learn the case, they believe that they need an extension to February 2, 2009, in order to familiarize themselves with the facts and prepare complete and adequate responses to the Complaint.

3. The undersigned represents that Plaintiff has consented to the extension Defendants request.

4. Only one extension of this deadline has previously been granted. On November 26, 2008, the parties stipulated that Defendants might have an extension of this deadline, from December 15, 2008 to January 15, 2009. Defendants accepted service of process on October 15, 2008.

5. Granting this extension will not affect other deadlines in this action.

6. Pursuant to Local Rule 7.1(d)(4), no brief is necessary as this Motion does not raise novel or complex legal issues.

WHEREFORE, Defendants respectfully request that the Court enter an Order extending the time in which Defendants must answer, move or otherwise respond to the Complaint to February 2, 2009.

Dated: January 8, 2009

HANGLEY ARONCHICK SEGAL & PUDLIN, P.C.

s/Sharon F. McKee

By: Sharon F. McKee
20 Brace Road, Suite 201
Cherry Hill, New Jersey 08034

Attorneys for Defendants Choicepoint, Inc.,
Choicepoint Services, Inc., National Data Retrieval,
Inc. and Superior Information Services, Inc.

CERTIFICATE OF SERVICE

I certify that on the 8th day of January, 2009, I electronically filed the foregoing Consent Motion to Extend the Time for Defendants to Answer, Move or Otherwise Respond to the Complaint with the Clerk of the Court, and the document is available for viewing and downloading from the CM/ECF system. Service was made on counsel for Plaintiff by CM/ECF filing:

James A. Francis, Esquire
John Soumilas, Esquire
FRANCIS & MAILMAN, P.C.
Land Title Building, 19th Floor
100 South Broad Street
Philadelphia, PA 19110

Attorneys for Plaintiff

s/Sharon F. McKee
Sharon F. McKee

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ORDER

AND NOW, this ____ day of January 2009, upon consideration of the Consent Motion to Extend the Time for Defendants to Answer, Move or Otherwise Respond to the Complaint, the Motion is hereby GRANTED. The time for Defendants to answer, move or otherwise respond to the Complaint is extended to and through February 2, 2009.

SO ORDERED.

Ann Marie Donio
U.S. Magistrate Judge